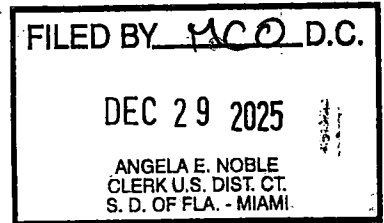


Sealed

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION



CASE NO. 24-24749-civ ALTONAGA/Reid
[Filed Under Seal Pursuant to 31 U.S.C. § 3730(b)]

UNITED STATES OF AMERICA,
ex rel. MARIO MIRABAL,
Plaintiff-Relator,

v.

DEUTSCHE BANK NATIONAL TRUST COMPANY, et al.,
Defendants.

RELATOR'S MOTION TO UNSEAL COMPLAINT AND CASE
RECORD

COMES NOW the Plaintiff-Relator, Mario Mirabal, proceeding pro se, and respectfully moves this Court to unseal the above-captioned False Claims Act matter, and in support thereof states:

I. GROUNDS FOR UNSEALING UNDER 31 U.S.C. § 3730(b)

This action was originally filed under seal pursuant to the provisions of the False Claims Act, 31 U.S.C. § 3730(b), and has remained under seal while the Government was afforded an opportunity to investigate.

As of the date of this filing, Plaintiff-Relator has not been advised of any intervention decision by the United States. However, related civil litigation and judicial proceedings in multiple state and federal courts have reached a critical inflection point, warranting urgent unsealing in the interest of justice.

II. EMERGENCY CIRCUMSTANCES AND PUBLIC INTEREST

Relator is currently subject to an imminent threat of unlawful eviction in violation of the Supremacy Clause, based on a facially void mortgage assignment previously documented in the sealed FCA complaint.

Despite judicial notice of overlapping federal litigation—including pending forensic examination (EXHIBIT A) of the fraudulent mortgage instrument in SDNY and U.S. Bankruptcy Court—state court actors have proceeded to enforce judgments derived from the same falsified evidence.

While Relator has presented hundreds of pages of filings and exhibits, the dispositive issue — whether the Relator's 2010 assignment of mortgage and the 1000's of assignments issued 2010-2025 are legally valid under the terms of the governing Pooling & Servicing Agreement (PSA) — can now be resolved by a straight-forward 5 minute advanced computational forensic

analysis.

(Da Silva Moore v. Publicis Groupe, 287 F.R.D. 182 (S.D.N.Y. 2012) The Court validated the admissibility of computational tools in high-volume forensic review under the Federal Rules of Evidence and Civil Procedure

In an age where advanced forensic comparisons are computationally accessible to any clerk, court, or citizen with an internet connection, revealing this variant of systemic fraud is no longer a matter of speculation, it is now computational reproducible verifiable fact.

The Relator's assignment and conveyance, one of 1000's challenged in this FCA case have now been formally challenged in six active dockets, including:

The U.S. District Court for the Southern District of New York (Cases 1:25-cv-07418, -07419, -07423),

The U.S. Bankruptcy Court for the Southern District of Florida (Case No. 25-23193-CLC),

Florida state court foreclosure and ejectment cases (e.g., Case No. 2018-018704-CA-01, Case No. 2024-022769-CA-01),

And now, appeals to the Florida Third District Court of Appeal.

The 5 minute advanced computational forensic analysis is in the public forum. Anyone with access to Any modern text-based intelligent

computational analysis tool (e.g., OpenAI GPT, Grok, Gemini, Claude)
can perform this test.

It bypasses the structural opacity that too often clouds securitization fraud — where legal complexity substitutes for plain review of governing documents. Allowing the Court, FBI and DOJ to directly examine the fraud predicate in under 5 minutes

The material facts in the sealed complaint are now already the subject of public judicial proceedings, and secrecy no longer serves the statutory purpose of investigation. In fact, continued sealing now impairs the enforcement of federal rights and the relator's ability to protect his property and person from unlawful deprivation.

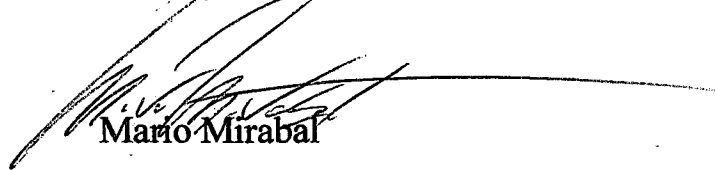
III. REQUEST FOR RELIEF

WHEREFORE, the Plaintiff-Relator respectfully requests:

- a. That this Court issue an order unsealing the FCA complaint and all supporting filings in this matter;
- b. That the Court direct the Clerk of Court to unseal the docket in its entirety, or in the alternative, grant Relator leave to file a public redacted version immediately;
- c. That the United States be served with this Motion and given 10 days to indicate any objection or request for redaction prior to unsealing, pursuant to local rules and § 3730(b)(3);

d. That this Motion be treated as urgent due to the irreparable harm threatened by continuing retaliatory action based on the very fraud alleged in this FCA complaint.

Respectfully submitted,



Mario Mirabal

Relator, Pro Se

563 W. 49th Street

Miami Beach, FL 33140

Email: solphax@gmail.com

Date: December 24, 2025

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via email and/or first-class mail to the U.S. Attorney's Office for the Southern District of Florida and Civil Frauds Division of the U.S. Department of Justice on this 24th day of December 2025, as required under 31 U.S.C. § 3730(b)(2).

Mario Mirabal